

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SYLVIA LONG,

Plaintiff,

v.

H & P CAPITAL, INC.,

Defendant.

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CIVIL ACTION NO.

3:11-cv-00547-O

MOTION TO WITHDRAW AS COUNSEL

Steven R. Dunn, Movant and attorney for H & P Capital, Inc. ("Defendant"), asks this Court to allow him to withdraw as attorney for Defendant.

1. Plaintiff is Sylvia Long. Plaintiff sued Defendant for damages allegedly sustained by Plaintiff after Defendant contacted Plaintiff and requested her to pay a lawful debt Plaintiff owed.
2. A pretrial conference is currently scheduled for March 28, 2013. Trial is scheduled for April 8, 2013.
3. Irreconcilable differences have arisen between attorney and client which make further representation impossible. To this end, Movant believes Defendant is no longer in operation and outstanding amounts due and owing to Movant have not been paid.
4. It is unknown whether Defendant will be seeking to retain another attorney in this matter.

5. Pursuant to Defendant's signature set forth hereinafter, Defendant does not oppose Movant's request to withdraw.

6. Defendant's last known address is 7960 Baymeadows Way, Suite 300, Jacksonville, FL 32256. Defendant's telephone number is (904) 418-5056. Defendant's email address is npooler@hpcapitalinc.com

D. Conclusion

8. Movant and Defendant have an irreconcilable conflict over several matters, which make further representation impossible.

E. Prayer

9. For these reasons, Steven R. Dunn asks this court to grant his motion to withdraw from the representation of Defendant in this case. Movant prays for such other and further relief, at law or in equity, to which Movant may be duly entitled.

Respectfully submitted,



/s/ Steven R. Dunn

Steven R. Dunn

State Bar No. 06252250

5420 LBJ Freeway, Suite 577

Dallas, Texas 75240

Telephone: (214) 692.5533

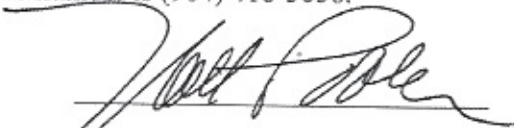
Facsimile: (214) 692.5534

steven@dunnlawfirm.net

ATTORNEY FOR DEFENDANT

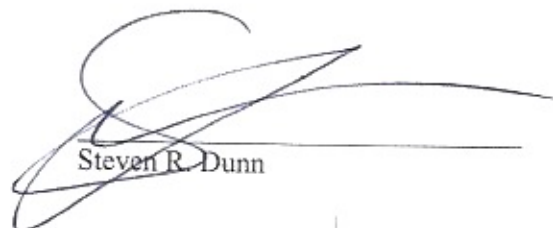
Consent to Withdrawal of Counsel

My name is Noel Pooler. I am a duly authorized officer for H & P Capital, Inc., Defendant in this case. I have received a copy of Movant's Motion to Withdraw and Defendant consents to same. Defendant's address is 7960 Baymeadows Way, Suite 300, Jacksonville, FL 32256. Defendant's telephone number is (904) 418-5056.


Noel Pooler

CERTIFICATE OF CONFERENCE

This is to certify that Steven R. Dunn contacted the attorney for Plaintiff regarding the merits of this Motion. Counsel did not oppose the Motion. It therefore is submitted to the Court for its approval.


Steven R. Dunn

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document was sent to all counsel of record pursuant to the Federal Rules of Civil Procedure on this 21 day of March 2013.


Steven R. Dunn